

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,  
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,  
CHRISTOPHER HUGHES, and  
THEFACEBOOK, INC.,

Defendants.

MARK ZUCKERBERG and  
THEFACEBOOK, INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER  
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

CIVIL ACTION NO. 1:04-cv-11923  
(DPW)

District Judge Douglas P.  
Woodlock

Magistrate Judge Robert B.  
Collings

**ASSENTED-TO MOTION FOR LEAVE TO FILE PLAINTIFF'S  
REPLY TO DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION  
TO COMPEL THE PRODUCTION OF MIRROR IMAGES OF  
DEFENDANTS' HARD DRIVES AND OTHER ELECTRONIC  
MEMORY DEVICES AND DOCUMENTS CREATED AFTER MAY 21, 2004**

Plaintiff ConnectU LLC hereby moves for leave to file a reply brief to Defendants' Opposition to Plaintiff's Motion to Compel the Production of Mirror Images of Defendants' Hard Drives and Other Electronic Memory Devices and Documents Created after May 21, 2004 (attached hereto as Exhibit A). The reply brief also

incorporates Plaintiff's Opposition to Thefacebook Defendants' Cross-Motion For Protective Order.

As grounds for this motion, a reply brief is necessary to address new issues raised in Defendants' Opposition and to address TheFacebook Defendants' Cross-Motion for a Protective Order, which they filed in the same document as Defendants' Opposition, and to clarify the record for the Court. New issues raised in Defendants' Opposition are Defendants' argument that ConnectU should not be permitted to obtain further discovery, including the discovery sought by Plaintiff's present motion to compel, without specifying its trade secrets, and various erroneous statements in Defendants' reply that require correction.

Plaintiff's reply (Exhibit A) will clarify these issues and will assist the Court in ruling on its Motion to Compel and on Thefacebook Defendants' Cross-Motion for a Protective Order. The proposed Order is attached as Exhibit B.

**CERTIFICATION UNDER L.R. 7.1**

Plaintiff's counsel hereby certifies under L.R. 7.1 that Troy Grabow, counsel for Plaintiff, conferred with Monte Cooper, counsel for Defendants, and that Defendants' counsel consents to this motion.

DATED: August 26, 2005

/s/Troy E. Grabow  
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